

Christopher J. Major, Esq.
MEISTER SEELIG & FEIN LLP
125 Park Avenue, 7th Floor
New York, New York 10017
Tel: (212) 655-3500
Email: cjm@msf-law.com

Attorneys for Royal Consumer Products, LLC

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

In re:

SEARS HOLDINGS CORPORATION, *et al.*,

Debtors.

Chapter 11

Case No. 18-23538 (RDD)

(Jointly Administered)

NOTICE OF APPEARANCE

PLEASE TAKE NOTICE that the undersigned appears as counsel for **Royal Consumer Products, LLC** (hereinafter “**RCP**”) in the above-captioned case¹, and pursuant to Bankruptcy Rules 2002, 7005, 9007 and 9010, and Sections 102(1), 342 and 1109(b) of Chapter 11, Title 11 of the United States Code (the “Bankruptcy Code”), requests that all notices given or required to be given in this case and all papers served in this case be given to and served upon the undersigned at the offices set forth below:

Christopher J. Major
MEISTER SEELIG & FEIN LLP
125 Park Avenue, 7th Floor
New York, New York 10017
Telephone: (212) 655-3500
Facsimile: (212) 655-3535
Email: cjm@msf-law.com

¹ This appearance should be entered in all proceedings involving all subsidiaries of Sears Holdings Corporation including, but not limited to In re: Kmart Corporation (18-23549) and In re: Sears, Roebuck and Co. (18-23537).

PLEASE TAKE FURTHER NOTICE that, pursuant to Section 1109(b) of the Bankruptcy Code, the foregoing demand includes not only the notices and papers referred to in the Bankruptcy Rules specified above, but also includes, without limitation, orders and notices of any applicant, motion, petition, pleading, request, complaint or demand, whether formal or informal, whether written or oral, and whether transmitted or conveyed by mail, delivery, telephone, telegraph, telefax, facsimile transmission, e-mail or otherwise, which affect the Debtors or property of the Debtors.

This Notice of Appearance and Request for Service of Papers shall not be deemed to be a waiver of **RCP**'s rights, without limitation, (1) to have final orders entered only after *de novo* review by a District Court Judge, (2) to trial by jury in any proceeding so triable in these Cases or any case, controversy or proceeding related to these Cases, (3) to have the District court withdraw the reference in any matter subject to mandatory or discretionary withdrawal or (4) to any other rights, claims, actions, setoffs or recoupments to which **RCP** is or may be entitled, in law or in equity, all of which rights, claims, actions, defenses, setoffs and recoupments **RCP** expressly reserves.

Dated: New York, New York
December 3, 2018

Respectfully submitted,

ROYAL CONSUMER PRODUCTS, LLC

By: /s/ Christopher J. Major
Christopher J. Major, Esq.

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Certification of Service

I hereby certify that on December 3, 2018 a copy of the within Notice of Appearance will be sent by email to all parties by operation of the Court's electronic filing system or by mail to anyone unable to accept electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the Court's CM/ECF System.

By: /s/ Christopher J. Major
Christopher J. Major